

Boies Ranches  
O. Steven Boies  
HC 34 Box 300  
Wells, NV 89835

Bureau of Land Management  
Elko District Office  
Bryan K. Fuell  
Manager, Wells Field Office  
3900 East Idaho Street  
Elko, NV 89801

Dear Mr. Fuell;

Please find enclosed comments and response to the Hubbard Vineyard Allotment Grazing Permit Renewal Environmental Assessment Ref. # 4130 (NVE0300) dated, January 2010.

Sincerely,

O. Steven Boies  
Boies Ranches

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Comments submitted by Boies Ranch Ref. #4130 (NVE0300):

#### Alternative #1

Alternative 1 represents the existing permit. In the mid-1990's Boies Ranch voluntarily implemented management changes introducing rest, and change of season of use. Using a cooperative adaptive management model that relies on the strength of collaboration we have made significant progress toward landscape objectives. Utilizing the expertise of representatives from Nevada Department of Wildlife, BLM, University of Nevada Reno Extension, Natural Resources Conservation Service, the Northeastern Nevada Stewardship Group, and interested individuals this group using their professional and local expertise formulate a yearly grazing plan that is analyzed and then authorized by the governing agency, the Elko District BLM. This plan has focused on wildlife issues as presented by NDOW and BLM biologists, cultural assets, mining, hunting, ATV and neighboring allotment concerns as they relate to the Hubbard Vineyard Allotment.

For over ten years, we have worked within the guidelines of Alternative 1 and have proven our ability to work toward and achieve objectives as set by the Standards and Guidelines.

#### Alternative #2

We can live with this alternative but it does not provide the level of flexibility of Alternative 1. Alternative 1 has proven successful in moving the allotment toward objectives and toward significant progress according to the Standard and Guidelines.

Concerns:

Pg. 7 "will be capped" Comment: We will stay within total AUM's for allotment but need flexibility and not restrictions per pasture.

Please clarify Flat Pasture use.

Coon Creek should be two years use in four and fence the springs like the Flat Pasture. Note the elk use in the Coon Creek Pasture.

- f. Utilization should be a measurement of entire pasture, reflecting the overall use of pasture not just a snapshot of one small area.

Pg. 12 2.3.5 "depending upon their status in the 2001 baseline year."

Comment: We question designating 2001 or any single year as a baseline. What of historic episodic weather events such as in 1983-84? What about what it looked like in 1887? 1955?

### Alternative #3

We categorically reject #3 . Choosing Alternative 3 would represent a capricious act on the part of the BLM and we believe ultimately result in the sale of Boies Ranch.

Comment: Probable cumulative affects if Alternative # 3 should be adopted.

- 1) Fragmentation of landscape by the sale of private parcels of land and water rights that are interspersed among public acres on permittee's allotment.
- 2) Destroying the economic viability of a multi-generational family ranch resulting in complete sale.
- 3) Loss of wildlife habitat if sale of private property fragments landscape.
- 4) Loss of generational knowledge of place that is irreplaceable in the short term.
- 5) Loss of American cultural heritage as represented by Western ranch culture.
- 6) Heightened fire potential due to increased fuels.

### Alternative #4

This represents high intensity, short duration grazing. On the Hubbard Vineyard Allotment this alternative would require a very costly long term investment in infrastructure of fences and water development.

Without those investments it would require hauling water and herding. This would result in negatively affecting wildlife and livestock. This is not an economically viable alternative for the permittee.

### Appendix 1 Proposed Projects

#9. "Permittee is responsible for ensuring that its employees, contractors.....or any others associated with the ranch do not collect artifacts, or damage or vandalize....."

Comment: This statement is beyond any reasonable duty of the permittee. Permittee can not be held responsible for others actions on public land something that is totally out of the permittee's control.

